



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**MEMORANDUM**

**DATE:** October 29, 1999

**SUBJECT:** Site Visit to Aubrey Manufacturing, Inc.

**FROM:** *Todd Gmitro*  
Todd Gmitro, Corrective Action Project Manager

**TO:** RCRA Files

**BACKGROUND and REGULATORY STATUS**

On October 14, 1999 I conducted a site visit to the Aubrey Manufacturing, Inc, facility in Union, IL. I met with Mr. Thomas Kucera, Engineering Manager of Aubrey Manufacturing, and Mr. David Edwards, P.G. of Environmental Resources Management (ERM). The purpose of the site visit was to evaluate what further corrective action work, if necessary, needs to be done at the facility; and then what would be the appropriate mechanism for implementing corrective action. Since Aubrey is included in the Government Performance and Results Act (GPRA) Baseline of RCRA corrective action facilities, the U.S. EPA Region 5 must ensure that the facility does not pose a threat to human health or the environment.

Prior to conducted the site visit a conducted a desk review of available documents on the facility. A PA/VSI, dated April 9, 1998 was conducted by TechLaw for the U.S. EPA Region 5. Aubrey is primarily engaged in the manufacturing of ventilation products and medicine cabinets. Aubrey became a RCRA regulated facility because they stored hazardous waste in an interim status surface impoundment. This impoundment is currently undergoing clean closure with oversight by the Illinois EPA (IEPA). On July 1, 1997 the IEPA approved the soil removal for the surface impoundment, however, some residual organic contamination remains in the groundwater. A monitoring well system is in place to define the extent of the plume and its movement. The surface impoundment was associated with a former electroplating operation which ceased in 1985. Partial closure of the surface impoundment included removal of 800 cubic yards of soil. A building now covers the location of the former impoundment. Vinyl chloride, TCE, TCA and nickel have been found in the groundwater. An upper plume extends approximately 840 feet down gradient, and a lower plume extends approximately 550 feet down gradient.

**CONCLUSIONS and RECOMMENDATION**

Besides for the former surface impoundment, there are 7 Solid Waste Management Units (SWMUs) at the facility. These consist of a waste oil accumulation area; a waste hydraulic oil accumulation area; two spray paint satellite accumulation areas; a hazardous waste 90-day accumulation area; a water treatment system; and a paint kitchen hazardous water satellite accumulation area. There have been no documented releases from any of these 7 SWMUs and

during the site visit I found no evidence of present or past releases. All these units are located indoors and any potential releases would be contained by berms and/or sealed concrete floors. Further details about these SWMUs and the surface impoundment closure history may be found in the PA/VSI. It is my conclusion that an RFI for any of the SWMUs at Aubrey manufacturing is not necessary. Also, since the IEPA has been overseeing the closure of the surface impoundment and has expressed interest in maintaining control of the groundwater monitoring, the U.S. EPA, Region 5 can be assured that all threats to human health and the environment are being addressed at this time at Aubrey Manufacturing. Based on the fact that the IEPA has approved the soil removal portion of the closure for the surface impoundment, I believe that a CA725 (Current Human Exposures Under Control) yes determination could be made now. Since the plume of contaminated groundwater seems to have stabilized, there are no current receptors, and continued groundwater monitoring will be occurring, I believe a CA750 (Migration of Contaminated Groundwater Under Control) yes determination can also be made at this time.